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June 1, 2023

Via Electronic Filing

The Honorable Judge Lorna G. Schofield
U.S. District Court, Southern District of New York
500 Pearl Street
New York, NY 11201

Re: *Doncouse v. LNC Wellness LLC et al*
Case No.: 1:23-cv-03228-LGS

Dear Honorable Judge Schofield:

This law firm represents Defendant LNC Wellness LLC (the “Defendant”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules B(1) and B(2), this letter respectfully serves to request an extension of Defendants time to reply or otherwise respond to Plaintiff’s Complaint to be extended through and including June 30th, 2023.

If granted, this request would necessitate an extension of the corresponding telephonic conference scheduled for June 7, 2023 [Dckt. No. 5] to be extended to a date and time convenient for the court.

Additionally, this request would necessitate an extension to refile an updated proposed case management plan to be extended through and including June 30th, 2023.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel¹ and the order defendant’s counsel. If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged [see Dckt. Nos. 12-13] and requires additional time to gather information from Defendant to respond to the Complaint.

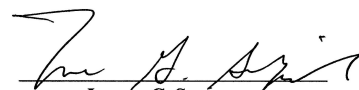
Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

Application **granted in part**. Defendant LNC Wellness LLC's deadline to answer or otherwise respond to the Complaint is extended to **June 30, 2023**. The request to adjourn the initial pretrial conference and deadline to file the parties' joint materials is **denied**. The Court does not typically adjourn the initial pretrial conference pending the filing of an answer or other response to the Complaint.

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 14.

Dated: June 2, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

¹ Plaintiff’s counsel’s consent was conditioned on an acknowledgement from Defendant to waive any defenses to personal jurisdiction due to improper service of process.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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